# Case 1:13-cv-01204-JTN-ESC ECF No. 1 filed 11/04/13 PageID.1 PageILED8\_GR

November 4, 2013 4:08 PM TRACEY CORDES, CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN BY. ns /\_\_\_\_ SCANNED BY: 15 /1105

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

RON ROGERS and DANTE' ANTOINE ROGERS, Plaintiffs,

Case No.

1:13-cv-1204

v.

Hon.

Janet T. Neff **U.S. District Judge** 

COMMANDER CHRIS McINTIRE, Defendant.

## - Verified -ACTION ON BONDS AND SPECIALITIES - 28 USC § 1874

#### Preliminary Statement.

- Plaintiffs have a substantial, direct, and legally protected interest in the relief sought and bring this action on bonds and specialities based on the plea of confession and consent to judgment issued by Defendant. A copy of the warrant to confess judgment (EXHIBIT A) and Defendant's plea of confession (EXHIBIT B) are attached hereto and incorporated herein by reference.
- 2. Defendant has appointed Plaintiffs as authorized representative for Defendant granting full authority and power for engaging in any and all actions necessary on behalf of Defendant for the sole purpose of causing public memorialization of Defendant's plea of confession (EXHIBIT B); as Plaintiffs in their sole discretion deem appropriate.

## Jurisdiction and Venue.

- 3. The Court has jurisdiction over this action on bonds and specialties pursuant to 28 USC §§ 1331, 1367, 1874, 2201 and/or 2202.
- 4. Venue is properly laid in this court pursuant to 28 USC § 1391(b) as Plaintiffs reside in, all events described herein occurred in, and Defendant conducts business in Kent County Michigan,
- 5. Public memorialization of Defendant's plea of confession is appraised at the sum certain amount of \$50,000.00. Satisfaction and accord may be established simply by causing public memorialization of Defendant's plea of confession with prejudice.

#### Parties

- 6. Plaintiff RON ROGERS is Agent for Plaintiff DANTE'
  ANTOINE ROGERS and resides at 4200 Norman, Kentwood, Michigan.
- 7. Plaintiff, DANTE' ANTOINE ROGERS, is a resident of Kent County currently housed at Jackson Prison JCS, 198059 3100 Cooper Street, Jackson, Michigan.
- 8. Defendant, COMMANDER CHRIS McINTIRE, is Commander for the Michigan Enforcement Team which conducts business at 345 Northland Drive NE, Rockford, MI 49341.

#### Facts

9. This action arises from the forfeiture, breach, or nonperformance of Defendant which appears by default and

confession of Defendant (See EXHIBITS).

10. The written plea of confession (EXHIBIT B) establishes the terms of an agreement entered into by Plaintiff DANTE' ANTOINE ROGERS and Defendant which was subsequently breached by Defendant (See EXHIBITS).

### Verification

11. The undersigned verify under the penalty of perjury that the facts state above are all true, correct, complete and certain to the best of their information, knowledge and belief.

# Conclusion and Relief Requested

FOR THESE REASONS, Plaintiffs ask the Court to accept Defendant's plea of confession with prejudice and cause it to become publicly memorialized by filing with the Clerk of the Court.

Dated: 23 October 2013

Ron Rogers

PRO SE' PLAINTIFF

4200 Norman

Kentwood, MI 49508

/s/ COMMANDER CHRIS McINTIRE
By: Dante' Antoine Rogers

ante' Anyoine Rogers

PRO SE' PLAINTIFF

c/o Jackson Prison - JCS

198059 - 3100 Cooper Street

Jackson, MI 49201